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Jury Trial Demand

6 **FILED**

7 **OCT 15 2024**

8 CLERK, U.S. DISTRICT COURT  
9 NORTHERN DISTRICT OF OHIO  
10 CLEVELAND

11 KELLY SLOBODIAN,  
12 4704 WEST 156 STREET CLEVELAND, OHIO 44135

13 MARK THOMAS  
14 4704 WEST 156 STREET CLEVELAND, OHIO 44135

15 Plaintiff,

16 vs.

17 CITY OF CLEVELAND  
18 601 LAKESIDE AVE RM 104 CLEVELAND, OHIO 44114

19 CITY OF CLEVELAND POLICE DEPARTMENT (1-10 EMPLOYEES TO  
20 BE IDENTIFIED)

21 1300 ONTARIO ROOM 227 CLEVELAND, OHIO 44114

22 , CITY OF CLEVELAND PROSECUTORS OFFICE (1-5 EMPLOYEES  
23 TO BE IDENTIFIED)

24 1200 ONTARIO # 8 CLEVELAND, OHIO 44114

25 ET AL

26 Defendant

27 Case No.:

28 **1 :24 CV01792**

Judge:

**JUDGE POLSTER**

COMPLAINT (JURY DEMAND ENDORSED  
HEREON)

4105.00 Paid 10/15/24 . Receipt #154539 AC

**Civil Cause of Action**

the civil lawsuit is filed under Ohio State law for issues such as premises liability, negligence, intentional wrongdoing, failure to fulfill duties, false prosecution, racism, sexism, corruption, and personal injuries resulting directly from the actions, inactions, and responsibilities of the defendants, as well as supervisory liability.

PLEADING TITLE - 1

### Jurisdiction.

This court has authority because all relevant actions and injuries occurred in Cleveland, Ohio, specifically in Cuyahoga County, under the direct oversight of the defendants. The Cleveland first district police officers failed to stop the harassment despite existing restraining orders and repeated violations. Police were called, and there are documented report numbers where officers can be identified through body camera footage and disciplinary reports. On the day of the assault, October 2, 2022, one officer was seen socializing with Steven Rogers, a participant in the assault who should have been arrested before the incident on October 2, 2022. Aqueelah Jordan had previously been informed about the dangerous situation and menacing, predatory behavior. The plaintiffs had warned them that their lives were at risk years earlier with multiple phone calls, police reports, intake reports filed, and meetings with investigators in the office.

**Statement of case:**

Kelly Slobodian grew up in WestPark, went to OLA for grade school, then St Joseph Academy for high school. After high school, she rented in West Park while working and going to college to become a Registered Nurse. She then came back to WestPark to start her career. Kelly finally purchased her first home on April 2007 by herself!!!! She was excited, Kelly thought that she finally had a place to call home, "my own sanctuary" It has been anything but that! Kelly started having problems with Steven M Rogers, her neighbor at 4700 W 156 Street almost immediately. He would knock on her door in the middle of the night and he would come into her backyard unannounced. As a single female living by herself, she became very cautious. Kelly researched Steven M Rogers on the internet and found that he had been arrested for kidnapping with firearm, rape with firearm X 3, Felonious Assault with Firearm, and Robbery with a firearm in 1983. Kelly would later find out on 5/27/21 he had his record expunged after telling officers and the court that what Kelly was stating was not true! A month later Steven M Rogers is threatening and flashing a gun at plaintiffs in front of the police. When plaintiffs addressed Officer Anthony Irby #2545 on 6/12/21 report # 2021-00176975, Kelly was cited for disorderly conduct which was fought and found to be Not Guilty!!! I tried to make it clear the first year I moved in, I was not interested in him and made it clear that I did not want him to enter my property. He then started to let his dogs out all day, all night, let them

bark constantly as a way of intimidation, did not clean up their feces(citations attached). He would only cut the front yard and left his backyard unkempt. His yard became absolutely appalling. There were insects, rodents, weeds that have now grown to be trees that encroach and damage Kelly's property. Kelly wanted to file complaints for many years but feared retaliation by Steven M Rogers and his family. I know what kind of person he is and wasn't willing to fight that battle alone. I also know from previous encounters with Cleveland police, that I didn't think I would be safe doing this alone. I thought if I left him alone he would leave me alone. At one time, I saw Steven M Rogers house was going through foreclosure and I prayed that one day, they would just leave. My friends and family have always hated coming over to my house because of the Rogers. One unusual time, I saw Steven M Rogers cutting his backyard. I decided I would approach him at the fence and advise him that his Great Dane was diving his paws/legs under my fence and making big holes under the fence, and I had to keep filling them with dirt. It was so bad that his dog pushed a basketball under my fence. He immediately got defensive and started cursing at me and threatening me. He continued to tell me that the fence is not mine, then stated that I keep "moving the fence"(not sure how I can move a fence), he accused my dog of being the one digging the holes, and stated that my garage is on his property. All not true. He was unreasonable and I couldn't speak to him, his wife came out yelling, cursing at me, and threatening me too. They then called their 2 adult daughters, Estee and Candice to fight me. Candice tried to hop over the fence and Estee actually came onto my property up my driveway. They admitted this in court. Judith has walked up on me from behind while I'm cutting my grass threatening me. I have had someone try to fix my fence and they have threatened them as well. These people have always been out of control and it keeps escalating. Since Mark moved in the year 2019, Steven M Rogers stalking, menacing, envy and harassment had amplified. Mark Thomas didn't realize how bad they were and first tried to talk to them. He wanted to see if he could reason with them. They are racist, against my interracial relationship, have made several comments to Mark, the police, in court, and to anyone that will listen, about the multiple black men I have dated. He has had cameras facing my property for multiple years, when I asked police if he is able to have them facing my property I was told there was nothing I could do. Even after going to court, getting a protection order stating Steven M Rogers cannot have any surveillance cameras, he continues to this day to have cameras up and also wears one on his chest. The police do not make him take them down. Steven M Rogers has continued to violate the protection order in place and every time the police were called, they would provide a report number and basically tell me there's nothing they can do and to just keep calling them. They have told me that they don't have the authority to arrest him for violating a civil protection order.

1 Why do I even have one? He violates, I call the police, I contact the city prosecutor and after years of this, Mark  
2 Thomas and I end up brutally assaulted, my property damaged, end up in an ambulance to the Emergency  
3 Department and now continue to deal with the pain they have caused while they are free to enjoy their lives. Both  
4 Mark Thomas and Kelly Slobodian have endured severe physical, mental, emotional, and spiritual distress because  
5 of this! Mark Thomas has been diligent in making sure that Steven M Rogers no longer abuses Kelly Slobodian.  
6 Steven Rogers has been stalking Kelly, harassing her and threatening her since 2007. He has now escalated to  
7 violence with his family since Mark and Kelly have stood up for themselves, documented with multiple police  
8 reports and a protection order obtained. This man and family are dangerous, compulsive liars, manipulative, and  
9 play the system any way possible. They

12 have made Kelly feel isolated in her home, unable to enjoy her yard, she cannot enjoy fresh air  
13 with her windows open, and fears they will harm her dog when she allows him outside, she cannot enjoy taking her  
14 dog for walks down the street, her friends and family don't want to come over, every noise outside she needs to look  
15 to make sure someone isn't trying to harm her or her family! Kelly also feels it is unsafe to have Mark's children  
16 live with us. I am terrified to do yard work, to swim in my pool, to BBQ, to garden, and to just enjoy my property.  
17 Kelly cannot go anywhere without letting Mark know where she is, when she arrives at a destination, and when she  
18 leaves so he knows that I am safe. They have caused Kelly to become withdrawn, have increased stress, anxiety,  
19 PTSD, panic attacks, and depression. Kelly has had to change her employer of 17 years to work from home. Mark  
20 has had to change his shift to be home at night for safety. Mark fears leaving Kelly alone, he has increased stress,  
21 hides his pain, depression, anxiety. We have had to go through counseling. Both Mark and I have lost money from  
22 taking time off of work for court, doctor's appointments, pain, stress, and anxiety r/t the Rogers, and over \$30000 in  
23 attorney fees to prove Steven Rogers was indeed in contempt. This has depleted Kelly's savings, money for upkeep  
24 on her house, I had to take out loans, and cannot afford to move! This has put a toll on Mark and Kelly's  
25 relationship. This is supposed to be their honeymoon phase of their relationship, they shouldn't have to be dealing  
26 with this situation! They have had to both endure counseling. Mark is extremely outgoing and has met a lot of  
27 neighbors that Kelly never got the chance to meet because she was afraid. Kelly and Mark have heard Steven Rogers  
28 tell neighbors serious lies about them. They have stated that Kelly is no longer a nurse, that Mark is smoking Meth,  
Mark is a gang member, that we never had a protection order against him, and so much more. Steven Rogers is a  
pathological liar. They have continued to attempt to turn people in the community against Mark And Kelly! This

1 is a game to this family, while searching police reports that were filed, they found numerous reports filed by the  
2 Rogers family that are false accusations. That alone is scary, that they can just file false police reports after false  
3 police report. Lastly, on 10/11/24 Steven Rogers shot Mark Thomas in his back after following him in his vehicle!  
4 Kelly and Mark are terrified for their lives, freedom, safety, and happiness!!! The City Of Cleveland Police , City  
5 Prosecutor, and Judges have been notified on multiple occasions that "they are waiting for the Rogers family to kill  
6 us"!  
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10 7/12/2018 Report # 2018-00205309 Police were called by Terry L Cline at address 4996 West 156  
11 Street opposite neighbor of Steven Rogers related to a property line dispute, Steven Rogers  
12 threatened  
13 to have his family settle it.  
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16 8/10/2018 Dead Dog Skull found at fence line and Kelly Slobodian calls the police and also  
17 questions the cameras facing her property  
18  
19

20 10/20/2018 Kelly is cutting overhanging bushes encroaching onto property and Steven Rogers  
21 starts threatening her life, states he's going to sue Kelly and he's going to call the police.  
22  
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24 12/6/20 at 0857 Report #2020-00381691 Steven Rogers calls police for cutting his bushes that are  
25 encroaching over Kelly's fence and property.  
26  
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28 12/6/20 at 1703 Report #2020-00382029 Steven Rogers calls police again for bushes and weeds  
encroaching onto my property and tells police that we are using it as a Christmas tree and put it in  
the garage.

2/5/21 Bellaire-Puritas Mediation with Ian Heisey at Kelly Slobodian request.

After Estee Rogers, Nintendue Arcade aka Cordero Rogers, Candace Rogers, and Wayne Langdale were arrested, Chief City Prosecutor Aqueelah Jordan charged plaintiff, Mark Thomas with a violation of a protective order based solely on Steven Rogers' testimony and a manipulated retaliatory video and dismissed listening to witnesses. Judge Jennifer O'Donnell dismissed the criminal charges against plaintiffs attackers without prejudice after being indicted not once but two times(the second with increased charges) and yet to have charges brought against them once again! Wayne Langsdale(a career violent criminal) was given probation after his arrest was made while illegally having a gun with children in the vehicle and Estee Rogers criminal arrest and charges have already been expunged! Mark Thomas was later found not guilty by a jury on charges brought by the City Prosecutor! The judicial system ruled in the plaintiff's favor in a civil lawsuit maliciously filed by Steven M Rogers that was filed as another form of retaliation by him. Currently, the false police reports are still being allowed, framing the plaintiffs as at fault for being assaulted at their own home. The city and its officials acted negligently and intentionally, causing lasting harm to the plaintiffs. The assault was due to the city of Cleveland's negligence since they had been called to Mark And Kelly's address before the attack on multiple occasions and dismissed. The City Prosecutor, Aqueelah Jordan has been emailed and called on multiple occasions with little to no response! The behavior of the city prosecutor and investigators is unacceptable, while the plaintiffs who are law-abiding tax paying citizens that were attacked because of their gender and ethnicity and relationship! . A HATE CRIME! They are now seeking compensatory damages, punitive damages, and damages for personal, emotional, physical, and mental harm.

Cause of action.

First cause of action: The City of Cleveland Police department has a duty to reasonably ensure the safety of its citizens. Due to the city's negligence, the plaintiff suffered severe mental, physical, spiritual, financial, and emotional injuries. State law requires the defendants to provide reasonable service and protection to all taxpaying citizens, which they failed to do, leading to the plaintiff's injuries at home. The plaintiff has not only sustained immediate injuries but also long-term physical and mental issues. Therefore, the plaintiff seeks damages exceeding \$5 million for the negligence and resulting injuries. The 1st District had been made aware of the sexual predatory harassment, racial harassment before assault of oct-2-2022 and shooting/attempted murder that can be seen with multiple police reports as shown by plaintiffs. The 1st district male misogynistic attitude concerning

violence towards Kelly and Mark hindered any pursuit of justice. The first district relationship with local hooligan Marco Periandi and Sheila Sagy Periandi allowed racial rumors and bias to surround plaintiff Mark Thomas of african -american decent. Mark is a college educated working american and the 1st district allowed a vicious rumor made by the Periandi's that he was a gangster from Detroit and Kelly has multiple men in and out thru the years! This is defamation of character and untrue! Mark is neither from detroit or ever resided in detroit.(body cam footage) The 1st district police facilitated and orchestrated a hostile/live endangering environment purposely to harass the plaintiffs, and force the plaintiffs out of their home to satisfy their personal relationships with local friends. The plaintiffs have reported this behavior to Internal affairs and the Office of professional standards supervising investigators. This is done by the police department to bully Mark as a disabled person Mark is classified as a disabled person that suffers from severe PTSD and anxiety.Last Known police report of recent harassment 24-287516 and 24-299585

### The second cause of action

18                   brings to light the serious failings of the defendant, specifically the city prosecutor, Aqueelah  
19                   Jordan. As the chief prosecutor, Jordan holds a crucial responsibility to act as a watchdog over public safety and to  
20                   alert the Cleveland police department of any significant threats lurking within the community, particularly the  
21                   alarming rise of racial tensions. Despite these responsibilities, Aqueelah Jordan was remiss in communicating the  
22                   full extent of potential dangers that had come to her attention.

The plaintiff asserts that Aqueelah Jordan had been previously warned about the escalating situation. A letter from her office had been dispatched to Steven Rogers and his family, clearly outlining the disturbing behaviors of menacing and stalking that they were experiencing. This correspondence was designed to highlight the growing racial bias that was permeating through the city, especially as it pertained to a hate crime investigation that had implications for many in the community. Instead of taking action to safeguard the plaintiffs family and others vulnerable to such hostility, the city prosecutor allowed Steven Rogers to cancel an ordered mediation session in 2021, as documented by the plaintiff.

1           This negligence on the part of the city prosecutor—failing to take the necessary precautions or to  
2 uphold her duties—resulted in severe consequences for the plaintiff. The inaction of Aqueelah Jordan, whether  
3 through oversight or direct failure to ensure proper supervision, has left the plaintiffs in a precarious position. As  
4 law-abiding, tax-paying citizens, the plaintiffs are abandoned and unprotected by the very system designed to  
5 safeguard their well-being. Not Only are the Plaintiffs career driven Americans, the plaintiffs are also professional  
6 entertainers and have lost monetary gain enormously due to Aqueelah Jordan's retaliatory false and malicious  
7 prosecution and abuse of power. Jordan also harasses Mark due to plaintiff being classified as a disabled member of  
8 society with intentions to bully, coerce, and harrass plaintiffs.  
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**The third cause of action**

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involves Judges Jennifer O'Donnell, Cassidy, and Deidra Turner, who had numerous chances to address the assault on October 2, 2022. They failed to discipline those involved despite clear evidence, allowing a vexatious litigant, Steven Rogers, to continue his harassment of plaintiff Kelly Slobodian. The female judges appeared to support the harassment, dismissing Kelly's pleas and portraying her as an entitled individual that is exaggerating instead of acknowledging the racist behavior of a black family towards an interracial couple. Their negligence showed a blatant disregard for Kelly's safety, leading to her lasting injuries. The plaintiff argues that the judges' instructions influenced the defendants' actions. As a result, Kelly seeks over \$4 million from each defendant and over \$42 million from the city of Cleveland for its failure to properly train employees on emergency responses and enforcing protection orders. The plaintiffs have reported these issues to multiple judicial and legal boards in Ohio, citing ties between chief prosecutor Aqueela Jordan and witness/attorney Joseph Lewondowski and Steven Rogers. Judges O'donnell and Cassidy purposely pro-longed proceedings for two years to deter plaintiffs from pursuing civil recourse. The Cleveland judicial court system is currently allowing Steven Rogers to pursue false

claims to date case # This is done by the judicial system knowing Mark is classified as a disabled person and suffers from Severe PTSD and anxiety. Judge O'donnell swiftly expunged charges from Estee Rogers records for what reasons unknown and dismissed charges of all involved in the 10/22/24 assault. Steven Roger arrested for shooting Mark on 10/11/24 2024-CRA-009124.

### *Prayer for relief*

1. in excess of \$ 5 million a piece per plaintiff compensatory for does 13-28 page 6 for negligence injury, and failure to protect 2. In excess of \$2 million a piece per plaintiff compensatory for 6-27 page 7 and 2-5 page 8 for negligence injury and failure to protect. 3. In excess of \$4 million a piece per plaintive compensatory for does 8-22 page 8 for negligence injury and intentional misconduct.

1. damages in excess of \$42 million for the principal defendant city of Cleveland for failure to train and supervise employees and for the injuries occurred in their city.
  2. Cost of suit
  3. All other relief as the court deems fair dated this 2nd day of October 2024

All other relief as the court de fair dated this 2nd day of October 2024  
Dated  
this day 2 of Month October year2024.

**Attorney Name**

Respectfully Submitted,

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